

**FILED**  
UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

AUG 24 2011

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**MATTHEW J. DYKMAN**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**OLADIPO ALABI** and  
**KEHINDE OGUNTOYINBO,**

Defendants.

CRIMINAL NO. 11-2292

Count 1: 18 U.S.C. §§ 1029(a)(3) and 2:

Access Device Fraud;

Count 2: 18 U.S.C. §§ 1028A(a)(1) and

2: Aggravated Identity Theft

INDICTMENT

The Grand Jury charges:

Count 1

On or about April 6, 2011, in Quay County, in the District of New Mexico, the Defendants, **OLADIPO ALABI** and **KEHINDE OGUNTOYINBO**, knowingly and with intent to defraud, possessed fifteen and more counterfeit and unauthorized access devices including but not limited to:

- (a) approximately thirty-three credit and debit card account numbers,
- (b) approximately nine re-encoded credit and debit cards, and
- (c) approximately 269 Social Security account numbers,

said possession affecting interstate and foreign commerce, in that the Defendants **OLADIPO ALABI** and **KEHINDE OGUNTOYINBO** were transporting the access devices in interstate commerce, namely, from California to Texas.

In violation of 18 U.S.C. §§ 1029(a)(3) and 2.


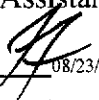
Count 2

On or about April 6, 2011, in Quay County, in the District of New Mexico, the Defendants, **OLADIPO ALABI** and **KEHINDE OGUNTOYINBO**, did knowingly possess, without lawful authority, a means of identification of another person during and in relation to the offense of Access Device Fraud in violation of 18 U.S.C. § 1029(a)(3), to wit: the true names of the legitimate owners of the access devices.

In violation of 18 U.S.C. §§ 1028A(a)(1) and 2.

A TRUE BILL:

/s/  
FOREPERSON OF THE GRAND JURY

  
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Assistant United States Attorney  
  
08/23/11 11:16am